

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RICHARD MCBRIDE, JOHN BEVERLY,
VICTOR LAMSON, DONALD TAYLOR,
RYAN FENNAL, MICHAEL VENEZIALE,
THOMAS MONZO, MANUEL
MARTINEZ, DANIEL MITCHELL,
KEVIN CUNNINGHAM, JUAN LOPEZ,
WAYNE GROVE, WILLIAM NEWNAM,
JR., and RYAN SHORT,

Plaintiffs

v.

KLINE CONSTRUCTION CO., INC.,
KLINE CONSTRUCTION CO., INC.
401(K) PLAN, KATHERINE KLINE-
PENATE, J. EDWARD KLINE, and
ROBERT MILLER,

Defendants.

Civil Action No.: 1:19-cv-14275-NLH-JS

JURY TRIAL DEMANDED

[PROPOSED] ORDER

This matter having come before the Court on the motion of Klehr Harrison Harvey Branzburg LLC, (“Movant”), attorneys for Defendants J. Edward Kline and Katherine M. Kline-Penate, for the *pro hac vice* admission of James A. Petkun (“Counsel”), pursuant to L. Civ. R. 101.1; and the Court having considered the certifications in support of the motion, which reflect that counsel satisfies the requirements set forth in L. Civ. R. 101.1(c)(1); and there being no objection to this motion; and for good cause shown:

It is ORDERED that the motion for the *pro hac vice* admission of Counsel on behalf of Defendants J. Edward Kline and Katherine M. Kline-Penate is granted;

IT IS FURTHER ORDERED that Counsel shall abide by all rules of this Court, including all disciplinary rules, and shall notify the Court immediately of any matter affecting Counsel’s standing at the bar of any court;

IT IS FURTHER ORDERED that Counsel is deemed to consent to the appointment of the Clerk of the Court as the agent upon whom service of process may be made for all actions against counsel that may arise from Counsel's participation in this matter;

IT IS FURTHER ORDERED that the Movant shall (a) be attorneys of record in this case in accordance with L. Civ. R. 101.1(c); (b) be served all papers in this action and such service shall be deemed sufficient service upon Counsel; (c) sign (or arrange for a member of the firm admitted to practice in New Jersey to sign) all pleadings, briefs, and other papers submitted to this Court; (d) appear at all proceedings; and (e) be responsible for the conduct of Counsel in this matter;

IT IS FURTHER ORDERED that Counsel shall make payments to the New Jersey Lawyer's Fund for Client Protection, pursuant to N.J. Court Rule 1:28-2, for each year in which Counsel represents the client in this matter;

IT IS FURTHER ORDERED that Counsel shall each pay \$150.00 to the Clerk of the United States District Court for the District of New Jersey for admission *pro hac vice* in accordance with L. Civ. R. 101.1(c)(3); and

IT IS FURTHER ORDERED that all terms of the orders entered in this case, including all deadlines set forth therein, shall remain in full force and effect and no delay in discovery, motions, trial or any other proceeding shall occur because of the participation of Counsel or their inability to be in attendance at proceedings.

Dated: _____, 2019

, J.